

EXHIBIT 1

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ROCKLAND**

HARLEY FREEMAN,

Plaintiff(s).

-against-

INTERCONTINENTAL HOTELS GROUP
RESOURCES, LLC,


Defendant(s).

Index No.:

Date Purchased:

SUMMONSPlaintiff designates Rockland County
as the place of trial.The basis of venue is:
Place of OccurrencePlaintiff resides at:
7218 Innisfree Lane
Dublin, Ohio 43017**To the above named Defendant:**

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: New City, New York
July 9, 2020

IRA H. LAPP, ESQ.
NEIMARK COFFINAS & LAPP LLP
Attorneys for Plaintiff(s)
HARLEY FREEMAN
37 Congers Road
New City, New York 10956-5135
(845) 638-3012
Our File No. 20-059

TO:

INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC

C/O SECRETARY OF STATE

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ROCKLAND

HARLEY FREEMAN,

Plaintiff(s).

-against-

INTERCONTINENTAL HOTELS GROUP
RESOURCES, LLC,

Defendant(s).

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VERIFIED COMPLAINT

Plaintiff by his attorneys, **NEIMARK COFFINAS & LAPP LLP** complaining of the Defendant, respectfully alleges, upon information and belief:

1. That at the time of the commencement of this action, the Plaintiff **HARLEY FREEMAN** was, and still is a resident of the State of Ohio.

2. That the cause of action alleged herein arose in the County of Rockland, State of New York.

3. That at all times hereinafter mentioned, the Defendant **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** was, and still is, a domestic limited liability corporation duly formed and existing under and by virtue of the laws of the State of New York.

4. That at all times hereinafter mentioned, the Defendant **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** was, and still is, a foreign limited liability corporation duly authorized to conduct and transact business in the State of New York.

5. That at all times hereinafter mentioned, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** owned the premises located at 20 Overlook Boulevard, Nanuet, New York.

6. That at all times hereinafter mentioned, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** was a lessor of the premises located at 20 Overlook Boulevard, Nanuet, New York.

7. That at all times hereinafter mentioned, the Defendant, **INTERCONTINENTAL**

HOTELS GROUP RESOURCES, LLC was a lessee of the premises located at 20 Overlook Boulevard, Nanuet, New York.

8. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** managed the aforesaid premises.

9. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** controlled the aforesaid premises.

10. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** maintained the aforesaid premises.

11. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** operated the aforesaid premises.

12. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** repaired the aforesaid premises.

13. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** was responsible for snow and ice removal at the aforesaid premises.

14. On February 13, 2019, Plaintiff **HARLEY FREEMAN** was lawfully on the aforesaid premises.

15. On February 13, 2019, while Plaintiff **HARLEY FREEMAN** was lawfully about a walkway area adjacent to the aforesaid premises, Plaintiff **HARLEY FREEMAN** was caused to fall and sustain serious and permanent injuries.

16. That at all times hereinafter mentioned, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** owned the aforesaid walkway area.

17. That at all times hereinafter mentioned, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** was a lessor of the aforesaid walkway area.

18. That at all times hereinafter mentioned, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** was a lessee of the aforesaid walkway area.

19. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** managed the aforesaid walkway area.

20. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** controlled the aforesaid walkway area.

21. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** maintained the aforesaid walkway area.

22. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** operated the aforesaid walkway.

23. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** repaired the aforesaid walkway area.

24. That at all times hereinafter mentioned, and upon information and belief, the Defendant, **INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC** was responsible for snow and ice removal at the aforesaid walkway area.

25. The above mentioned occurrence, and the results thereof, were caused by the joint, several and concurrent negligence of the Defendant and/or said Defendant's agents, servants, employees and/or licensees in the ownership, operation, management, repair, maintenance and control of the aforesaid premises and walkway area.

26. That no negligence on the part of the Plaintiff contributed to the occurrence alleged herein in any manner whatsoever.

27. That as a result of the foregoing, Plaintiff was caused to sustain serious injuries and to have suffered pain, shock, mental anguish; that these injuries and their effects will be permanent; as a result of said injuries Plaintiff was caused, and will continue to be caused, to incur expenses for medical care and attention; and Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss therefrom.

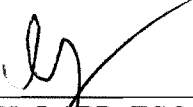
28. That this action falls within one or more of the exceptions as set forth in CPLR Section 1602.

29. That by reason of the negligence of the Defendant the Plaintiff **HARLEY FREEMAN**

sustained damages which exceed the jurisdictional limits of all lower Courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff **HARLEY FREEMAN** demands judgment against the Defendant in an amount that exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction, together with costs and disbursements of this action.

Dated: New City, New York
July 9, 2020



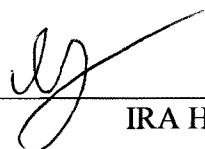
IRA H. LAPP, ESQ.
NEIMARK COFFINAS & LAPP LLP
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ATTORNEY'S VERIFICATION

IRA H. LAPP, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under the penalties of perjury: I am an attorney at NEIMARK COFFINAS & LAPP LLP, attorneys of record for Plaintiff(s), HARLEY FREEMAN. I have read the annexed **COMPLAINT** and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my files.

This verification is made by me because Plaintiff(s) is/are not presently in the county wherein I maintain my offices.

DATED: New City, New York
July 9, 2020



IRA H. LAPP

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SUMMONS & VERIFIED COMPLAINT

NEIMARK COFFINAS & LAPP LLP

Attorneys for Plaintiff(s)

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New City, New York 10956-5135

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